

1 THAD A. DAVIS (SBN 220503)
thad.davis@ropesgray.com
2 ROCKY C. TSAI (SBN 221452)
rocky.tsai@ropesgray.com
3 ROPES & GRAY LLP
Three Embarcadero Center, Ste 300
4 San Francisco, California 94111-4006
Tel: (415) 315- 6300
5 Fax: (415) 315-6350

6 HARVEY J. WOLKOFF (*Pro hac vice* application filed)
harvey.wolkoff@ropesgray.com
7 MARK P. SZPAK
mark.szpak@ropesgray.com
8 LARA A. ORAVEC
lara.oravec@ropesgray.com
9 ROPES & GRAY LLP
Prudential Tower, 800 Boylston Street
10 Boston, MA 02199-3600
Tel: (617) 951-7606
11 Fax: (617) 235-0215

12 Attorneys for Defendants
SONY COMPUTER ENTERTAINMENT AMERICA LLC and
13 SONY NETWORK ENTERTAINMENT INTERNATIONAL
14 LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 OAKLAND DIVISION
18

19 KRISTOPHER JOHNS, on Behalf of Himself and
for the Benefit of All with the Common or
20 General Interest, Any Persons Injured, and All
Others Similarly Situated,

21 Plaintiff,

22 v.

23 SONY COMPUTER ENTERTAINMENT
24 AMERICA LLC, a Delaware Limited Liability
Company; SONY NETWORK
25 ENTERTAINMENT INTERNATIONAL LLC, a
Delaware Limited Liability Company,,
26

27 Defendants.
28

Case No. 4:11-cv-02063-SBA

**STIPULATION TO EXTEND
TIME FOR DEFENDANTS TO
MOVE, ANSWER, OR
OTHERWISE RESPOND TO
COMPLAINT**

Judge: Hon. Sandra B. Armstrong

1 WHEREAS, defendants Sony Computer Entertainment America LLC (“SCEA”) and
 2 Sony Network Entertainment International LLC (“SNEI”), as well as certain related entities
 3 (collectively, the “Sony Defendants”), have been named as defendants in at least nineteen (19)
 4 putative class action lawsuits within this District, to date (collectively, the “N.D. Cal. Sony
 5 Litigations”);

6 WHEREAS, certain of the Sony Defendants have also been named as defendants in at
 7 least fourteen (14) putative class action lawsuits pending outside this District, to date, including at
 8 least five (5) suits in the Central District of California, one (1) suit in the Southern District of
 9 California, one (1) suit in the Southern District of New York, one (1) suit in the Eastern District
 10 of New York, one (1) suit in the District of Massachusetts, one (1) suit in the Eastern District of
 11 Michigan, two (2) suits in the Southern District of Texas, one (1) suit in the District of
 12 Connecticut, and one (1) suit in the Southern District of Florida (collectively, with the N.D. Cal.
 13 Sony Litigations, the “U.S. Sony Litigations”);

14 WHEREAS, a motion is currently pending before the Judicial Panel on Multidistrict
 15 Litigation (the “JPML”) to centralize this and other matters, to which one response has been filed
 16 to date, and as to which other responses, including Sony Defendants’ response, are due by June 2,
 17 2011.

18 WHEREAS, the current deadlines for the defendants in the above-captioned action to
 19 respond to the Complaint are May 19 and May 20, 2011, respectively;

20 WHEREAS, the parties have agreed to the extension of time herein for the defendants in
 21 the above-captioned action to move, answer, or respond to the Complaint, in order to facilitate the
 22 scheduling of this matter in coordination with the schedule for the motion before the JPML;

23 NOW, THEREFORE, pursuant to Civil Local Rules 6-1(a), 7-1(a), and 7-12, all parties,
 24 by and through their respective counsel, hereby stipulate as follows:

25 The deadline for the defendants to respond to the Complaint in the above-captioned action
 26 is extended until and including 30 days after a consolidated complaint is filed in a multidistrict
 27 litigation centralizing the above-captioned action with other matters, or if centralization is denied
 28 by the JPML, then 30 days from the date of such order denying centralization.

1 Either party may seek ex parte relief from this stipulated Order for good cause shown,
2 including, but not limited to, Defendants' filing of a responsive pleading in a related case.

3
4 Dated: May 17, 2011

IRA P. ROTHKEN
JARED R. SMITH
ROTHKEN LAW FIRM

5
6
7 By: /s/ Ira P. Rothken /s/ [as authorized]
Ira P. Rothken

8 Attorneys for Plaintiff
9 KRISTOPHER JOHNS

10 Dated: May 17, 2011

HARVEY WOLKOFF
THAD A. DAVIS
ROCKY C. TSAI
ROPES & GRAY LLP

11
12
13
14 By: /s/ Rocky C. Tsai /s/
Rocky C. Tsai

15 Attorneys for Defendants
16 SONY COMPUTER
17 ENTERTAINMENT AMERICA LLC
18 and
19 SONY NETWORK ENTERTAINMENT
INTERNATIONAL LLC

20 **ORDER**

21 PURSUANT TO STIPULATION, IT IS SO ORDERED.

22 Dated: 5/24/11

23 
United States District Court Judge